

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN  
FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF  
ONE HUNDRED TWENTY NINTH OMNIBUS OBJECTION TO CLAIMS  
SHOULD REVIEW THE OMNIBUS OBJECTION TO SEE IF THEIR  
NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS  
OBJECTION AND/OR IN THE EXHIBIT ATTACHED THERETO TO  
DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR  
CLAIM(S).**

**IF YOU HAVE QUESTIONS, PLEASE CONTACT  
DEBTORS' COUNSEL, LEE J. GOLDBERG, AT 212-310-8928.**

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
Robert J. Lemons

Attorneys for Debtors  
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**In re** : Chapter 11 Case No.  
: **08-13555 (JMP)**  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** :  
: (Jointly Administered)  
**Debtors.** :  
-----X

**NOTICE OF HEARING ON DEBTORS' ONE HUNDRED TWENTY NINTH  
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY DERIVATIVES CLAIMS)**

**PLEASE TAKE NOTICE** that on April 18, 2011, Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the “Debtors”), filed their one hundred twenty-ninth omnibus objection to claims (the “Debtors’ One Hundred Twenty-ninth Omnibus Objection to Claims”), and that a

hearing (the “Hearing”) to consider the Debtors’ One Hundred Twenty-Ninth Omnibus Objection to Claims will be held before the Honorable James M. Peck, United States Bankruptcy Judge, in Courtroom 601 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **June 2, 2011 at 10:00 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

**PLEASE TAKE FURTHER NOTICE** that any responses to the Debtors’ One Hundred Twenty-Ninth Omnibus Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and served in accordance with General Order M-399, and on (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) attorneys for the Debtors, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Robert J. Lemons, Esq. and Lee J. Goldberg, Esq.); (iii) the Office of the United States Trustee for Region 2, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq., Elisabetta Gasparini, Esq., and Andrea B. Schwartz, Esq.); and (iv) attorneys for the official committee of unsecured creditors appointed in these cases, Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005 (Attn: Dennis F. Dunne, Esq., Dennis O’Donnell, Esq., and Evan Fleck, Esq.); so as to be so filed and received by no later than **May 18, 2011 at 4:00 p.m.**

**(Eastern Time)** (the “Response Deadline”).

**PLEASE TAKE FURTHER NOTICE** that if no responses are timely filed and served with respect to the Debtors’ One Hundred Twenty-Ninth Omnibus Objection to Claims or any claim set forth thereon, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Debtors’ One Hundred Twenty-Ninth Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: April 18, 2011  
New York, New York

/s/ Robert J. Lemons  
Robert J. Lemons

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

Attorneys for Debtors  
and Debtors in Possession

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
Robert J. Lemons

Attorneys for Debtors and  
Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----x  
In re : Chapter 11 Case No.  
: :  
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : 08-13555 (JMP)  
: :  
Debtors. : (Jointly Administered)  
-----x

**DEBTORS' ONE HUNDRED TWENTY-NINTH OMNIBUS  
OBJECTION TO CLAIMS (NO LIABILITY DERIVATIVES CLAIMS)**

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN  
FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS ONE  
HUNDRED TWENTY-NINTH OMNIBUS OBJECTION TO CLAIMS  
SHOULD REVIEW THE OMNIBUS OBJECTION TO SEE IF THEIR  
NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS  
OBJECTION AND/OR IN THE EXHIBIT ATTACHED THERETO TO  
DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR  
CLAIM(S).**

**IF YOU HAVE QUESTIONS, PLEASE CONTACT  
DEBTORS' COUNSEL, LEE J. GOLDBERG, AT 212-310-8928.**

TO THE HONORABLE JAMES M. PECK  
UNITED STATES BANKRUPTCY JUDGE:

Lehman Brothers Holdings Inc. (“LBHI”) and its affiliated debtors, in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the “Debtors”), respectfully represent:

**Relief Requested**

1. The Debtors file this one hundred twenty-ninth omnibus objection to claims (the “One Hundred Twenty-Ninth Omnibus Objection to Claims”) pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the “Procedures Order”) [Docket No. 6664], seeking to disallow and expunge the claims listed on Exhibit A annexed hereto.

2. The Debtors have examined the proofs of claim identified on Exhibit A (collectively, the “No Liability Derivatives Claims”) and have determined that the No Liability Derivatives Claims should be disallowed and expunged on the basis that they provide no basis of liability as to the Debtors. After a review of the claimant’s supporting documentation and the Debtors’ books and records, the Debtors have determined that, based on the fair, accurate, and reasonable values of the subject Derivatives Contracts (as defined herein) and the netting provisions thereunder, the Debtors do not owe any amounts to the claimants but rather, in most cases, the respective claimants actually owe money to the Debtors based on such Derivatives Contracts. Therefore, the No Liability Derivatives Claims do not constitute valid *prima facie* claims, and the Debtors request they be disallowed and expunged in their entirety.

3. The Debtors reserve all their rights to object on any basis to any No Liability Derivatives Claim as to which the Court does not grant the relief requested herein.

**Jurisdiction**

4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

## **Background**

5. Commencing on September 15, 2008 and periodically thereafter, LBHI and certain of its subsidiaries commenced with this Court voluntary cases under chapter 11 of title 11 of the Bankruptcy Code. The Debtors' chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b). The Debtors are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. On September 17, 2008, the United States Trustee for Region 2 (the "U.S. Trustee") appointed the statutory committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the "Creditors' Committee").

7. On January 19, 2009, the U.S. Trustee appointed Anton R. Valukas as Examiner in the above-captioned chapter 11 cases (the "Examiner") and by order, dated January 20, 2009 [Docket No. 2583], the Court approved the U.S. Trustee's appointment of the Examiner. The Examiner has filed his report pursuant to section 1106(b) of the Bankruptcy Code [Docket No. 7531].

8. On July 2, 2009, this Court entered an order setting forth procedures for filing proofs of claim in these chapter 11 cases, including procedures for filing proofs of claim and supporting documentation for claims based on Derivatives Contracts<sup>1</sup> (the "Bar Date Order") [Docket No. 4271]. The Bar Date Order provided that "each holder of a claim against a Debtor based on amounts owed pursuant to any Derivative Contract must: . . . complete the electronic Derivative Questionnaire [and] electronically upload supporting documentation on the website . . . ." (Bar Date Order at 7) The Bar Date Order further provided that "each holder of a

---

<sup>1</sup> "Derivative Contract" is defined in the Bar Date Order as meaning "any contract that is of (i) a 'swap agreement' as such term is defined in section 101(53B) of the Bankruptcy Code or (ii) a 'forward contract' as such term is defined in section 101(25) of the Bankruptcy Code . . . ." (See Bar Date Order at 6).

claim against a Debtor based on a Guarantee by a Debtor of the obligations of a non-Debtor entity under a Derivative Contract must [also]: . . . complete the electronic Guarantee Questionnaire and electronically upload supporting documentation on the website . . . .” (*Id.* at 8.) A copy of the Bar Date Order was made publicly available at <http://www.lehman-docket.com>.

9. Exhibit C to the Bar Date Order was a version of the Derivative Questionnaire, which required that the claimant provide various information in support of its claim, such as copies of relevant agreements; a copy of the termination notice; a valuation statement; individual trade-level detail; trade value methodology and quotations; and unpaid amounts, collateral, and other costs associated with the claim pursuant to the Derivatives Contract. Also attached to the Bar Date Order was Exhibit D, a version of the Guarantee Questionnaire setting forth the information forming the basis of the claimant’s assertions of a guarantee claim.

10. On January 14, 2010, the Court entered the Procedures Order, which authorizes the Debtors, among other things, to file omnibus objections to no more than 500 claims at a time, on various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order.

#### **The No Liability Derivatives Claims Should Be Disallowed and Expunged**

11. In reviewing the claims filed on the claims register in these cases and maintained by the Court-appointed claims agent, the Debtors have identified the No Liability Derivatives Claims as claims that should be disallowed and expunged on the basis that they provide no basis of liability as to the Debtors. The Derivatives Contracts that underlie the No Liability Derivatives Claims have either been terminated or matured pursuant to the terms thereof. After a review of the claimants’ supporting documentation and the Debtors’ books and

records, the Debtors have determined that, based on the fair, accurate, and reasonable values of the subject Derivatives Contracts and the netting provisions thereunder, the Debtors do not owe any amounts to the claimants but rather either no amounts are owed under the Derivatives Contracts to either party or the respective claimants actually owe money to the Debtors based on such Derivatives Contracts, and, therefore, the No Liability Derivatives Claims do not constitute valid *prima facie* claims.

12. A filed proof of claim is “deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). If an objection refuting at least one of the claim’s essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009); *In re Adelphia Commc’ns Corp.*, Ch. 11 Case No. 02-41729 (REG), 2007 Bankr. LEXIS 660 at \*15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000).

13. The Debtors have developed and currently utilize a thorough, multi-step process to review claims filed against the Debtors and based on a Derivatives Contract (“Derivatives Claims”) in order to determine the fair, accurate, and reasonable value, if any, of such claims or, alternatively, the monetary recovery due to the Debtors with respect to the subject Derivatives Contract. In order to determine the amounts due under a Derivatives Contract, the Debtors: (i) collect and review documents related to the relevant Derivatives Claim including, but not limited to, the relevant Derivatives Questionnaire and/or Guarantee Questionnaire, the termination notice, and the valuation statement; (ii) reconcile posted collateral and any cash payments already received, made, or missed; and (iii) review the valuation methodology used by the claimant to determine the value of the claim, including verifying the legitimacy of quotes provided by the claimant in connection with their valuation statement,

reviewing claimant's "loss" calculation, and evaluating any set-off claims.<sup>2</sup> Furthermore, the Debtors engage in, to the extent the holder is willing to so engage, lengthy negotiations with the holder of the Derivatives Claim that are often very detailed and may extend over a period of months.

14. The Debtors have undertaken this lengthy process with respect to each of the No Liability Derivatives Claims and concluded that a fair, accurate, and reasonable valuation of the No Liability Derivatives Claims demonstrates that the Debtors do not owe any of the claimants money and that, either no amounts are owed to either party or the claimant in fact owes the Debtors money. Accordingly, the Debtors request that the Court disallow and expunge in their entirety the No Liability Derivatives Claims listed on Exhibit A.

15. In an effort to resolve differences between the Debtors and claimants asserting No Liability Derivatives Claims and because the subject Derivatives Contracts mostly constitute Derivatives Contracts for which the Debtors are owed money, the Debtors expect in many instances to commence alternative dispute resolution procedures approved by this Court in either (i) the *Affirmative Dispute Resolution Procedures Order for Affirmative Claims of Debtors Under Derivatives Contracts*, dated September 17, 2009 [Docket No. 5207] or (ii) the *Order Pursuant to Section 105 of the Bankruptcy Code, Bankruptcy Rule 9014, and General Order M-390 Authorizing the Debtors to Implement Claims Hearing Procedures and Alternative Dispute Resolution Procedures for Claims Against Debtors*, dated April 19, 2010 [Docket No. 8474], as applicable.

---

<sup>2</sup> For a more comprehensive discussion of the valuation process, please see the Declaration of Gary H. Mandelblatt in Support of Debtors' Motion Pursuant to Section 502(b)(9) of the Bankruptcy Code and Bankruptcy Rule 3003(c)(3) for Establishment of the Deadline for Filing Proofs of Claim, Approval of the Form and Manner of Notice Thereof and Approval of the Proof of Claim Form (attached as "Exhibit C" to Debtors' Omnibus Reply to Objections to Motion of the Debtors, Pursuant to Section 502(b)(9) of the Bankruptcy Code and Bankruptcy Rule 3003(c)(3), for Establishment of the Deadline for Filing Proofs of Claim, Approval of the Form and Manner of Notice Thereof and Approval of the Proof of Claim Form [Docket No. 4113]).

**Notice**

16. No trustee has been appointed in these chapter 11 cases. The Debtors have served notice of this One Hundred Twenty-Ninth Omnibus Objection to Claims on (i) the U.S. Trustee; (ii) the attorneys for the Creditors' Committee; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; (vi) each claimant listed on Exhibit A, and (vii) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [Docket No. 9635]. The Debtors submit that no other or further notice need be provided.

17. No previous request for the relief sought herein has been made by the Debtors to this or any other Court.

WHEREFORE the Debtors respectfully request entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: April 18, 2011  
New York, New York

/s/ Robert J. Lemons  
Robert J. Lemons

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

Attorneys for Debtors  
and Debtors in Possession

**Exhibit A**

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	1100 VERMONT OWNER LLC C/O JOSS REALTY PARTNERS 520 MADISON AVENUE, 29TH FLOOR NEW YORK, NY 10022	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	07/23/2009	5932	\$15,950.00	No Liability Claim
2	1199 SEIU HEALTH CARE EMPLOYEES PENSION FUND C/O WESTERN ASSET MANAGEMENT COMPANY ATTN: LEGAL DEPT. W-923 385 E. COLORADO BLVD. PASADENA, CA 91101	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	20872	\$931,901.86	No Liability Claim
3	1199 SEIU HEALTH CARE EMPLOYEES PENSION FUND C/O WESTERN ASSET MANAGEMENT COMPANY ATTN: LEGAL DEPT W-923 385 E. COLORADO BLVD PASADENA, CA 91101	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/21/2009	21007	\$931,901.86	No Liability Claim
4	1199 SEIU HEALTH CARE EMPLOYEES PENSION FUND INDEX PLUS C/O WESTERN ASSET MANAGEMENT COMPANY ATTN: LEGAL DEPT W-11445 PASADENA, CA 91101	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	20920	\$150,645.67	No Liability Claim
5	1199 SEIU HEALTH CARE EMPLOYEES PENSION FUND INDEX PLUS C/O WESTERN ASSET MANAGEMENT COMPANY ATTN: LEGAL DEPT. W- 1445 385 COLORADO BLVD. PASADENA, CA 91101	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/21/2009	21061	\$150,645.67	No Liability Claim

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
6	AMERICAN AIRLINES, INC. C/O ROBERT D. ALBERGOTTI HAYNES AND BOONE, LLP 2323 VICTORY AVE., STE 700 DALLAS, TX 75261-9616	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	17298	\$3,801,000.00	No Liability Claim
7	AMERICAN AIRLINES, INC. C/O ROBERT D. ALBERGOTTI HAYNES AND BOONE, LLP 2323 VICTORY AVE., STE 700 DALLAS, TX 75219	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	17300	\$3,801,000.00	No Liability Claim
8	BANCA POPOLARE DELL'ETRURIA E DEL LAZIO ATTN: ROBERTO RAINERI BANCA POPOLARE DELL'ETRURIA E DEL LAZIO SCRL SERVIZIO GESTIONE PROPRIETA' E TERZI VIA CALMANDREI, 255 MAREZZO, 52100 ITALY	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/03/2009	10214	\$2,023.94	No Liability Claim
9	BLACK DIAMOND ARBITRAGE OFFSHORE LTD E/K/A BLACK DIAMOND ARBITRAGE OFFSHORE LDC C/O CARLSON CAPITAL, L.P. - ATTN: STEVE PULLY 2100 MCKINNEY AVENUE, 16TH FLOOR DALLAS, TX 75201	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	17160	Undetermined	No Liability Claim

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
10	BLACK DIAMOND ARBITRAGE OFFSHORE LTD (FKA BLACK DIAMOND ARBITRAGE OFFSHORE LDC) C/O CARLSON CAPITAL, LP ATTN: STEVE PULLY 2100 MCKINNEY AVENUE, 16TH FLOOR DALLAS, TX 75201	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	17165	Undetermined	No Liability Claim
11	CAIXA PENEDES GESTIO, S.G.I.I.C, S.A. ACTING ON BEHALF OF FONPENEDES GARANTIT INTERES MES BORSA IX ATTN: DANIEL ZAPLANA & JOSE MANUEL SANCHEZ, & LAURA DE LA FUENTE RAMBLA NOSTRA SENYORA, 2-4, 80720 VILAFRANCA DEL PENEDES BARCELONA, SPAIN	08-13893 (JMP)	Lehman Brothers OTC Derivatives Inc.	09/22/2009	29600	\$39,001.02	No Liability Claim
12	CENTRAL STREAM SHIPPING CORPORATION ATTN: HODENOBU NAKAGAWA, DIRECTOR 37-23, SHIOMI-CHO, MINATO-KU NAGOYA CITY AICHI PREF, 455- 0028 JAPAN	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	18789	\$775,612.21	No Liability Claim

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
13	CWABS ASSET BACKED CERTIFICATE TRUST 2006-19, ASSET BACKED CERTIFICATE SERIES 2006-19  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST NEW YORK, NY 10286	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14493	Undetermined	No Liability Claim
14	CWABS ASSET BACKED CERTIFICATES TRUST 2006-19, ASSET BACKED CERTIFICATES, SERIES 2006-19  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST NEW YORK, NY 10286	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	14449	Undetermined	No Liability Claim
15	CWABS ASSET-BACKED CERTIFICATES TRUST 2007-6  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14451	Undetermined	No Liability Claim

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
16	CWABS ASSET-BACKED CERTIFICATES TRUST 2007-6  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR  101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	14452	Undetermined	No Liability Claim
17	CWABS ASSET-BACKED CERTIFICATES TRUST 2007-BC2, ASSET BACKED CERTIFICATES SERIES 2007-BC2  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR  101 BARCLAY STREET; 8 WEST NEW YORK, NY 10286	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	14450	Undetermined	No Liability Claim
18	CWABS ASSET-BACKED CERTIFICATES TRUST 2007-BC2, ASSET BACKED CERTIFICATES SERIES 2007-BC2  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR  101 BARCLAY STREET; 8 WEST NEW YORK, NY 10286	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14471	Undetermined	No Liability Claim

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
19	CWABS ASSET-BACKED NOTES TRUST 2007-SEA2  ASSET-BACKED NOTES, SERIES 2007-SEA2  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST NEW YORK, NY 10286	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14462	Undetermined	No Liability Claim
20	CWABS ASSET-BACKED NOTES TRUST 2007-SEA2,  ASSET-BACKED NOTES, SERIES 2007-SEA2  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST NEW YORK, NY 10286	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	14463	Undetermined	No Liability Claim
21	CWABS, INC ASSET BACKED CERTIFICATES SERIES 2005-AB4  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14438	Undetermined	No Liability Claim

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
22	CWABS, INC ASSET BACKED CERTIFICATES SERIES 2005-BC5  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	14441	Undetermined	No Liability Claim
23	CWABS, INC ASSET-BACKED CERTIFICATES SERIES 2005-AB4  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	14437	Undetermined	No Liability Claim
24	CWABS, INC ASSET-BACKED CERTIFICATES SERIES 2005-AB5  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14440	Undetermined	No Liability Claim

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
25	CWABS, INC. ASSET BACKED CERTIFICATES SERIES 2005-BC5  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14442	Undetermined	No Liability Claim
26	CWABS, INC. ASSET BACKED CERTIFICATES SERIES 2006-13  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	14443	Undetermined	No Liability Claim
27	CWABS, INC. ASSET BACKED CERTIFICATES SERIES 2006-13  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14444	Undetermined	No Liability Claim

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
28	CWABS, INC. ASSET BACKED CERTIFICATES SERIES 2006-22  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	14494	Undetermined	No Liability Claim
29	CWABS, INC. ASSET BACKED CERTIFICATES SERIES 2006-22  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14495	Undetermined	No Liability Claim
30	CWABS, INC. ASSET BACKED CERTIFICATES SERIES 2006-3  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	14498	Undetermined	No Liability Claim

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
31	CWABS, INC. ASSET BACKED CERTIFICATES SERIES 2006-3  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14499	Undetermined	No Liability Claim
32	CWABS, INC. ASSET BACKED CERTIFICATES SERIES 2006-4  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14500	Undetermined	No Liability Claim
33	CWABS, INC. ASSET BACKED CERTIFICATES SERIES 2006-4  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	14501	Undetermined	No Liability Claim

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
34	CWABS, INC. ASSET-BACKED CERTIFICATES SERIES 2005-AB5  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	14439	Undetermined	No Liability Claim
35	CWABS, INC. ASSET-BACKED CERTIFICATES SERIES 2006-5  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	14502	Undetermined	No Liability Claim
36	CWABS, INC. ASSET-BACKED CERTIFICATES SERIES 2006-5  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14503	Undetermined	No Liability Claim

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
37	CWALT INC., ALTERNATIVE LOAN TRUST 2006-OC10  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	14477	Undetermined	No Liability Claim
38	CWALT INC., ALTERNATIVE LOAN TRUST 2006-OC10  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14478	Undetermined	No Liability Claim
39	CWALT, INC. ALTERNATIVE LOAN TRUST 2006-OC3  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	14479	Undetermined	No Liability Claim

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
40	CWALT, INC. ALTERNATIVE LOAN TRUST 2006-OC3  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14480	Undetermined	No Liability Claim
41	CWALT, INC. ALTERNATIVE LOAN TRUST 2006-OC7  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	14488	Undetermined	No Liability Claim
42	CWALT, INC. ALTERNATIVE LOAN TRUST 2006-OC7  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14489	Undetermined	No Liability Claim

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
43	CWALT, INC. ALTERNATIVE LOAN TRUST 2006-OC8  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	14490	Undetermined	No Liability Claim
44	CWALT, INC. ALTERNATIVE LOAN TRUST 2006-OC8  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14491	Undetermined	No Liability Claim
45	CWALT, INC. ALTERNATIVE LOAN TRUST 2007-0H3 MORTGAGE PASS-THROUGH CERTIFICATES SERIES 2007-0H3  THE BANK OF NEW YORK MELLON, AS SWAP CONTRACT ADMINISTRATOR FOR CREDITOR 101 BARCLAY STREET; 8 WEST NEW YORK, NY 10286	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14484	Undetermined	No Liability Claim

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
46	CWALT, INC. ALTERNATIVE LOAN TRUST 2007-OH3 MORTGAGE PASS-THROUGH CERTIFICATES SERIES 2007-OH3 THE BANK OF NEW YORK MELLON, AS TRUSTEE FOR CREDITOR 101 BARCLAY STREET; 8 WEST ATTN: MARTIN FEIG - VICE PRESIDENT NEW YORK, NY 10286	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	14483	Undetermined	No Liability Claim
47	ESPERANCE FAMILY FOUNDATION, THE 3672 PROSPECT RD ANN ARBOR, MI 48105-9534	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	15276	\$275,200.00	No Liability Claim
48	FORT DEARBORN LIFE INSURANCE COMPANY C/O COLLEEN N. WERTZ 1020 WEST 31ST STREET DOWNTOWN GROVE, IL 60515-5591	08-13893 (JMP)	Lehman Brothers OTC Derivatives Inc.	09/22/2009	31776	\$1,784,427.00	No Liability Claim
49	HSBC BANK USA NATIONAL ASSOCIATION, AS TRUSTEE FOR STRUCTURED ADJUSTABLE RATE MORTGAGE LOAN TRUST SERIES 2004-1 CTLA STRUCTURED FINANCE ATTN: FERNANDO ACEBEDO 10 EAST 40TH STREET, 14TH FLOOR NEW YORK, NY 10016	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	28790	Undetermined	No Liability Claim

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
50	HSBC BANK USA NATIONAL ASSOCIATION, AS TRUSTEE FOR STRUCTURED ADJUSTABLE RATE MORTGAGE LOAN TRUST SERIES 2004-1  ATTN: FERNANDO ACEBEDO CTLA STRUCTURED FINANCE 10 EAST 40TH STREET, 14TH FLOOR BUFFALO, NY 14203	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	28786	Undetermined	No Liability Claim
51	HSBC BANK USA, NA, AS TRUSTEE FOR STRUCTURED ADJUSTABLE RATE MORTGAGE LOAN TRUST SERIES 2005-1  CTLA-STRUCTURED FINANCE ATTN: FERNANDO ACEBEDO 10 EAST 40TH STREET, 14TH FLOOR NEW YORK, NY 10016	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	28531	Undetermined	No Liability Claim
52	HSBC BANK USA, NATIONAL ASSOCIATION, AS TRUSTEE FOR STRUCTURED ADJUSTABLE RATE MORTGAGE LOAN TRUST SERIES 2004-14  CTLA - STRUCTURED FINANCE ATTN: FERNANDO ACEBEDO 10 EAST 40TH STREET, 14TH FLOOR NEW YORK, NY 10016	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	28777	Undetermined	No Liability Claim

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
53	HSBC BANK USA, NATIONAL ASSOCIATION, AS TRUSTEE FOR STRUCTURED ADJUSTABLE RATE MORTGAGE LOAN TRUST SERIES 2004-12 CTLA - STRUCTURED FINANCE ATTN: FERNANDO ACEBEDO 10 EAST 40TH STREET, 14TH FLOOR NEW YORK, NY 10016	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	28778	Undetermined	No Liability Claim
54	HSBC BANK USA, NATIONAL ASSOCIATION, AS TRUSTEE FOR STRUCTURED ADJUSTABLE RATE MORTGAGE LOAN TRUST SERIES 2004-12 CTLA-STRUCTURED FINANCE ATTN: FERNANDO ACEBEDO 10 EAST 40TH STREET, 14TH FLOOR NWE YORK, NY 10016	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	28784	Undetermined	No Liability Claim
55	HSBC BANK USA, NATIONAL ASSOCIATION, AS TTEE FOR STRUCTURE ADJUSTABLE RATE MORTGAGE LOAN TRUST SERIES 2005-1, CTLA - STRUCTURED FINANCE ATTN: FERNANDO ACEBEDO 10 EAST 40TH STREET, 14TH FLOOR NEW YORK, NY 10016	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	28776	Undetermined	No Liability Claim
56	INTERNATIONAL BANK FOR RECONSTRUCTION & DEVELOPMENT ATTN: NIRMALIJIT SINGH PAUL 1818 H STREET N.W. MSN MC7-706 WASHINGTON, DC 20433	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	18976	\$11,757,799.75*	No Liability Claim

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
57	INTERNATIONAL BANK FOR RECONSTRUCTION & DEVELOPMENT ATTN: NIRMALIJIT SINGH PAUL 1818 H STREET N.W. MSN MC7-706 WASHINGTON, DC 20433	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	18977	\$11,757,799.75*	No Liability Claim
58	INTERNATIONAL FINANCE CORPORATION ATTN: VP, FINANCE AND TREASURER 2121 PENNSYLVANIA AVE NW WASHINGTON, DC 20433	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/21/2009	21858	\$3,343,311.00*	No Liability Claim
59	INTERNATIONAL FINANCE CORPORATION ATTN: VICE PRESIDENT, FINANCE AND TREASURER 2121 PENNSYLVANIA AVE, N.W. WASHINGTON, DC 20433	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	21863	\$3,343,311.00*	No Liability Claim
60	MIZRAHI TEFAHOT BANK LTD 7 JABOTINSKY ST RAMAT GAN, 52136 ISRAEL	08-13901 (JMP)	Lehman Brothers Commercial Corporation	09/18/2009	19171	\$2,774,348.69*	No Liability Claim
61	MIZRAHI TEFAHOT BANK, LTD ATTN: IRENE GRUBER, LEGAL DIVISION 7 JABOTINSKY STREET RAMAT GAN, 52136 ISRAEL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19170	\$2,774,348.69*	No Liability Claim
62	MMC UK PENSION PLAN - GLOBAL SMALL CAP EQUITY C/O PUTNAM INVESTMENTS ATTN: STEPHEN GIANELLI ONE POST OFFICE SQUARE BOSTON, MA 02109	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/21/2009	23690	\$2,902.64*	No Liability Claim

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
63	MMC UK PENSION PLAN - GLOBAL SMALL CAP EQUITY C/O PUTNAM INVESTMENTS ATTN: STEPHEN GIANELLI ONE POST OFFICE SQUARE BOSTON, MA 02109	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	23691	\$2,897.44*	No Liability Claim
64	NATIONAL RAILROAD RETIREMENT INVESTMENT TRUST C/O WESTERN ASSET MANAGEMENT COMPANY ATT: LEGAL DEPT W-1734 385 E. COLORADO BLVD PASADENA, CA 91101	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	20948	\$2,560,092.14	No Liability Claim
65	NATIONAL RAILROAD RETIREMENT INVESTMENT TRUST C/O WESTERN ASSET MANAGEMENT COMPANY ATT: LEGAL DEPT W-1734 385 E. COLORADO BLVD PASADENA, CA 91101	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/21/2009	20960	\$2,560,092.14	No Liability Claim
66	NEWTON, ROGER AND COCO JTWROS 3672 PROSPECT RD ANN ARBOR, MI 48105-9534	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	15248	\$469,000.00	No Liability Claim
67	PENSIOENFONDS MEDEWERKERS APOTHEKEN NEUHUYSKADE 92 DEN HAAG, 2596 XM NETHERLANDS	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	30705	\$48,581.82	No Liability Claim

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
68	QIC DIVERSIFIED FIXED INTEREST FUND NO 1  QUEENSLAND INVESTMENT CORPORATION  LEVEL 6, CENTRAL PLAZA II, 66 EAGLE STREET  BRISBANE QLD, 4000  AUSTRALIA	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	28066	\$259,688.00	No Liability Claim
69	QIC DIVERSIFIED FIXED INTEREST FUND NO 1  QUEENSLAND INVESTMENT CORPORATION  LEVEL 6, CENTRAL PLAZA II, 66 EAGLE STREET  BRISBANE, QLD, 4000  AUSTRALIA	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	28068	\$259,688.00	No Liability Claim
70	THE BANK OF NEW YORK MELLON, TRUSTEE FOR CREDITOR STRUCTURED ASSET SECURITIES CORPORATION  MORTGAGE PASS-THROUGH CERTIFICATES, SER 2003-40A  ATTN: MARTIN FEIG, VICE PRESIDENT  101 BARCLAY STREET; 8 WEST  NEW YORK, NY 10286	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14472	Undetermined	No Liability Claim
71	THE BANK OF NEW YORK MELLON, TRUSTEE FOR CREDITOR STRUCTURED ASSET SECURITIES CORPORATION  MORTGAGE PASS-THROUGH CERTIFICATES, SER 2003-37A  ATTN: MARTIN FEIG, VICE PRESIDENT  101 BARCLAY STREET; 8 WEST  NEW YORK, NY 10286	08-13899 (JMP)	Lehman Brothers Derivative Products Inc.	09/17/2009	14474	Undetermined	No Liability Claim

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
72	THE BANK OF NEW YORK MELLON, TRUSTEE FOR CREDITOR STRUCTURED ASSET SECURITIES CORPORATION MORTGAGE PASS-THROUGH CERTIFICATES, SER 2003-40A ATTN: MARTIN FEIG, VICE PRESIDENT 101 BARCLAY STREET; 8 WEST NEW YORK, NY 10286	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	14475	Undetermined	No Liability Claim
73	THE BANK OF NEW YORK MELLON, TRUSTEE FOR CREDITOR STRUCTURED ASSET SECURITIES CORPORATION SERIES 2003-BC3 ATTN: MARTIN FEIG, VICE PRESIDENT 101 BARCLAY STREET; 8 WEST NEW YORK, NY 10286	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14575	Undetermined	No Liability Claim
74	THE BANK OF NEW YORK MELLON, TRUSTEE FOR CREDITOR STRUCTURED ASSET SECURITIES CORPORATION MORTGAGE PASS-THROUGH CERTIFICATES, SER 2003-37A ATTN: MARTIN FEIG, VICE PRESIDENT 101 BARCLAY STREET; 8 WEST NEW YORK, NY 10286	08-13899 (JMP)	Lehman Brothers Derivative Products Inc.	10/19/2009	41767	Undetermined	No Liability Claim

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
75	THE BANK OF NEW YORK MELLON, TRUSTEE FOR CREDITOR STRUCTURED ASSET SECURITIES CORPORATION MORTGAGE PASS-THROUGH CERTIFICATES, SER 2003-37A ATTN: MARTIN FEIG, VICE PRESIDENT 101 BARCLAY STREET; 8 WEST NEW YORK, NY 10286	08-13899 (JMP)	Lehman Brothers Derivative Products Inc.	10/19/2009	41771	Undetermined	No Liability Claim
76	WELLS FARGO BANK, NA AS TRUSTEE OF THE SUPPLEMENTAL INTEREST TRUST FOR BNC MORTGAGE LOAN TRUST MORTGAGE PASS THROUGH CERTIFICATES 2007-4 C/O MARY SOHLBERG MAC N9311-161 MINNEAPOLIS, MN 55479	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/21/2009	24858	Undetermined	No Liability Claim
77	WELLS FARGO BANK, NA AS TRUSTEE FOR IMPAC CMB TRUST SERIES 2005-3, COLLATERALIZED ASSET BACKED BONDS, SERIES 2005-3 C/O MARY SOHLBERG MAC N9311-161 MINNEAPOLIS, MN 55479	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/21/2009	24860	Undetermined	No Liability Claim

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
78	WELLS FARGO BANK, NATIONAL ASSOCIATION, NOT INDIVIDUALLY BUT SOLELY IN CAPACITY AS TRUSTEE OF IMPAC CMB TRUST SERIES 2005-3, COLLATERALIZED ASSET-BACKED BONDS, SERIES 2005-3 C/O MARY SOHLBERG MAC N9311-161 MINNEAPOLIS, MN 55479	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	24762	Undetermined	No Liability Claim
79	WELLS FARGO BANK, NATIONAL ASSOCIATION, NOT INDIVIDUALLY BUT SOLELY IN CAPACITY AS TRUSTEE FOR THE SUPPLEMENTAL INTEREST TRUST FOR BNC MORTGAGE LOAN TRUST, MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2007-4 C/O MARY SOHLBERG MAC N9311-161 MINNEAPOLIS, MN 55479	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	24764	Undetermined	No Liability Claim

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 129: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
80	WELLS FARGO BANK, NATIONAL ASSOCIATION, NOT INDIVIDUALLY BUT SOLELY IN ITS CAPACITY AS TRUSTEE FOR IMPAC CMB TRUST SERIES 2005-3, COLLATERALIZED ASSET-BACKED BONDS, SEROES 2005-3 C/O WELLS FARGO BANK, NATIONAL ASSOCIATION ATTN: MARY SOHLBERG, MAC N9311-161 MINNEAPOLIS, MN 55479	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	33084	Undetermined	No Liability Claim
TOTAL							\$54,573,170.29

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----x  
**In re** : **Chapter 11 Case No.**  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**  
**Debtors.** : **(Jointly Administered)**  
-----x

**ORDER GRANTING DEBTORS' ONE HUNDRED TWENTY-NINTH  
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY DERIVATIVES CLAIMS)**

Upon the one hundred twenty-ninth omnibus objection to claims, dated April 18, 2011 (the “One Hundred Twenty-Ninth Omnibus Objection to Claims”),<sup>1</sup> of Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the “Debtors”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664] (the “Procedures Order”), seeking disallowance and expungement of the No Liability Derivatives Claims on the grounds that they assert claims for which the Debtors have no liability, all as more fully described in the One Hundred Twenty-Ninth Omnibus Objection to Claims; and due and proper notice of the One Hundred Twenty-Ninth Omnibus Objection to Claims having been provided to (i) the U.S. Trustee; (ii) the attorneys for the Creditors’ Committee; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; (vi) the claimants listed on Exhibit A attached to the One Hundred Twenty- Ninth Omnibus Objection to Claims; and (vii) all other parties entitled to notice in accordance with the

---

<sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Debtors’ One Hundred Twenty-[xth] Omnibus Objection to Claims.

procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [Docket No. 9635]; and the Court having found and determined that the relief sought in the One Hundred Twenty- Ninth Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the One Hundred Twenty- Ninth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the One Hundred Twenty-Ninth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Order supersedes all previous orders regarding the No Liability Derivatives Claims listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, any claim listed on Exhibit A annexed to the One Hundred Twenty-Ninth Omnibus Objection to Claims; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2011  
New York, New York

---

UNITED STATES BANKRUPTCY JUDGE